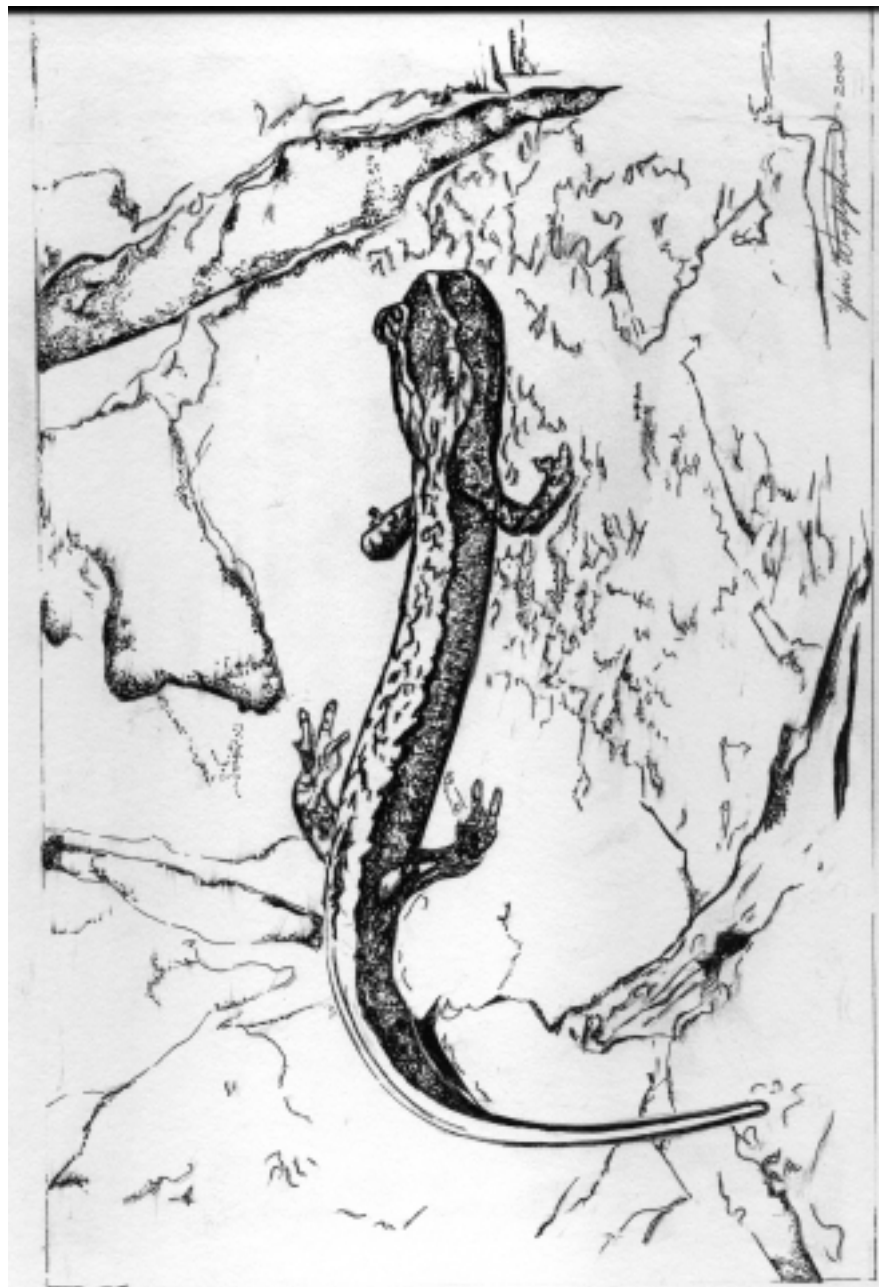


## Appendix H

### Letters from Federal Agencies, State and Local Governments, American Indian Tribes and, Elected Officials





# Appendix H

## **Letters from Federal Agencies, State and Local Governments, American Indian Tribes and, Elected Officials**

This appendix contains comment letters received on the Draft Supplemental Environmental Impact Statement For Amendment to the Survey and Manage, Protection Buffer, and Other Mitigation Measures Standards and Guidelines from Federal, State, and local government agencies, American Indian Tribal organizations, and elected officials. Also included are letters from the Interagency Advisory Committee (IAC) and a number of Provincial Advisory Committees (PACs) established by the Northwest Forest Plan.

The Environmental Protection Agency (EPA) has a legal obligation under Section 309 of the Clean Air Act to review and comment on environmental impact statements. Their letter reviewing the Draft SEIS appears at the beginning of this appendix. An explanation of the EPA rating criteria is also included.



# List of Letters Received

Environmental Protection Agency  
EPA Rating System Criteria  
Department of Energy, Bonneville Power Administration

Oregon State Department of Agriculture

Douglas County Board of Commissioners  
Jackson County Commissioner, Sue Kupilas  
San Miguel County, Board of Commissioners  
County of Siskiyou, Board of Supervisors

Coquille Indian Tribe  
Point No Point Treaty Council  
The Confederated Tribes of the Warm Springs Reservation of Oregon

Congress of the United States

Washington State House of Representatives

Intergovernmental Advisory Committee  
California Coast Provincial Advisory Committee  
Deschutes Provincial Advisory Committee  
Willamette Provincial Advisory Committee



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FEB 25 2000

USDA Forest Service - CAET  
P. O. Box 221090  
Salt Lake City, UT 84122

From: California Coast Provincial Advisory Committee

Re: COMMENTS, DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT  
STATEMENT FOR THE SURVEY AND MANAGE STANDARDS AND  
GUIDELINES OF THE NORTHWEST FOREST PLAN

Date: February 18, 2000

The California Coast Provincial Advisory Committee (CCPAC) is a federally chartered advisory group comprised of federal and state agency representatives, local officials, tribal representatives and non-governmental interest group delegates who work to promote the objectives of the federal Northwest Forest Plan (NFP).

At its meeting on February 2, 2000, the CCPAC considered the Draft Supplemental Environmental Impact Statement (DSEIS) for the Survey and Manage Standards and Guidelines of the Northwest Forest Plan (NFP). The consideration included a review of the draft and presentations about the draft by a representative from the DSEIS Team and Forest Service biologists who will be responsible for the implementation of the standards and guidelines. As a result of this review, the federal and non-federal CCPAC members present approved, by consensus, the following comments and recommendations to be submitted as part of the public comment on the document.

1. Re: Appendix G, p. 468, we recommend that you provide the actual annual timber harvest statistics within the area of the NFP for the years 1994-1999, segregated by National Forest and Bureau of Land Management District, and, if the information is so available, further by land management category such as Matrix and Late Successional Reserve lands.
2. Strategic surveys are critical to the success of the Survey and Management program. Therefore, clarification should be provided with regard to the administrative responsibility for the initiation of the strategic survey process and for the conduct of the strategic surveys. Field representatives should be included in the planning for strategic surveys.
3. Provision should be made to provide adequate funding for the conduct of the strategic surveys and this funding should not come from the existing operating budgets of the federal land management agencies. This funding should be available throughout life of the Survey and Manage Plan, with a significant infusion of funds in the first five years to ensure it can be implemented.

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SURVEY AND  
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4. The provisions for the consideration of changing categories or delisting of species are appropriate but there should be a definite timeline for action on requests for recategorizing or delisting. Timely feedback to forests and districts is critical to the effective implementation of this process. It is recommended that consideration be given to fully funding taxa and S & M teams for at least the next five years so that implementation of the selected alternative can proceed effectively. As long as team members are performing these duties in only a collateral capacity, the process will be considerably slowed.

5. An effectiveness monitoring program is needed to evaluate the effects of adaptive management actions. In addition, a monitoring or research program is needed to evaluate the effects, immediate and longer term, of disturbance activities on Survey and Manage species.

6. The shift from "ground disturbing" to "habitat disturbing" as the determination of when certain Survey and Manage actions must be taken is a welcome change.

7. Because of substantial environmental differences between conditions within Washington and Oregon and that of California, there is an urgent need to provide funding and designated staff to increase the representation and participation of California federal agencies on deliberative groups that are developing standards, guidelines, and protocols for the NFP.

The CCPAC respectfully requests a response that indicates the actions that are taken in response to the comments and recommendations listed above.

Submitted by the Designated Federal Official, Daniel K. Chisholm, on behalf of the CCPAC. If you have questions or responses regarding these comments, please send them to me and I will distribute them to the CCPAC members.



DANIEL K. CHISHOLM  
Forest Supervisor  
Mendocino National Forest



## Congress of the United States

Washington, DC 20515

March 3, 2000

51231

The Honorable George Frampton  
 Chairman  
 Council on Environmental Quality  
 Old Executive Office Building  
 Washington, D.C. 20500

Dear Chairman Frampton,

We are writing to express our on-going interest in the management of Northwest forests under the Northwest Forest Plan. As you know, the Northwest Forest Plan, which was adopted in 1994, was designed to respond to the competing interests in the Northwest, including the need for a stable supply of forest products and, equally important, habitat for more than 1000 species associated with late-successional and old-growth forests.

On December 3, 1999, the Bureau of Land Management (BLM) and Forest Service managers announced the release of the Draft Supplemental Environmental Impact Statement to amend the "survey and manage" mitigation measures of the Northwest Forest Plan. The document is supposed to incorporate what the Forest Service and BLM have learned during the last five years about implementing the "survey and manage" provisions of the Northwest Forest Plan. These provisions detail how the Forest Service and BLM should manage approximately 400 rare and little known species.

We understand the recommendations in the draft document were designed to incorporate the most up-to-date science, better protect rare and little known species, and use the agencies' limited resources more efficiently. When finalized, the document will provide new guidance on how the agency implements the survey and manage provision. While we agree with these goals, concerns have been raised that the draft does not consider all possible alternatives.


We request that a "no logging old growth" alternative be considered in the Draft Supplemental Environmental Impact Statement. The alternative could include provisions to mitigate for loss in production from old growth forests to come from second and third growth stands. Any changes to the Northwest Forest Plan are monumental and we believe it is important for all possible alternatives to be considered. The purpose of this request is not to advocate a specified solution, but assure all potential options are considered.

Thank you for your attention to this matter.

With warm regards,



Adam Smith  
 Member of Congress



David Wu  
 Member of Congress

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Lynn Woolsey

J. Ansel

Bob

Earl Blumauer

Sam Lam

Jim McDevitt

Robert J. Matsui

Nancy Peloni

George Miller

Mike Simpson

Darlene Hooley

Barbara Lee

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51231

List of Cosigners:

Lynn Woolsey (CA)  
Member of Congress

Jay Inslee (WA)  
Member of Congress

Brian Baird (WA)  
Member of Congress

Earl Blumenauer (OR)  
Member of Congress

Sam Farr (CA)  
Member of Congress

Jim McDermott (WA)  
Member of Congress

Robert Matsui (CA)  
Member of Congress

Nancy Pelosi (CA)  
Member of Congress

George Miller (CA)  
Member of Congress

Mike Thompson (CA)  
Member of Congress

Darlene Hooley (OR)  
Member of Congress

Barbara Lee (CA)  
Member of Congress